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April 11, 2022

VIA ECF

United States District Court
Eastern District of New York
Attn: Hon. Diane Gujarati, U.S.D.J.
225 Cadman Plaza East
Brooklyn, NY 11201-1804

Re: JGIAP RH 160 LLC v. CRI Holding Corp., et al.
Case No.: 1:21-cv-2489 (DG) (JRC)

Dear Judge Gujarati:

This firm represents Manda International Corp. (“Manda”), Strikeforce Mechanical Corp. (“Strikeforce”), and Angel Corrao (“Corrao”) (Manda, Strikeforce, and Corrao collectively hereinafter referred to as “Defendants”) in the above referenced case.

Defendants write pursuant to ¶ III(B)(4) of this Court’s Individual Practices to submit this cover letter notifying that Defendants have served all counsel of record with the following moving papers in support of their motion to dismiss the complaint.

- Notice of motion
- Memorandum of law in support
- Declaration of Emanuel Kataev, Esq. in support
 - Exhibit A – complaint filed in this case
 - Exhibit B – publicly available information for JGIAP RH 160 LLC
 - Exhibit C – AIA contract between Plaintiff and Manda
 - Exhibit D – State court petition by Red Hook 160 LLC against Manda, *et al.*
 - Exhibit E – publicly available information for Red Hook 160 LLC
 - Exhibit F – transcript of September 3, 2021 pre-motion conference

Defendants respectfully note that, while Plaintiff’s counsel Ryan Wilson has not been employed by Armstrong Teasdale for approximately more than a month now, Defendants will serve him via email at rmwilson.edny@gmail.com, through which email he has been communicating with all parties of record since his apparent separation of employment with Armstrong Teasdale. Notably, while Local Civil Rule 1.3(d) requires an attorney who is a member of the bar of this Court to *immediately* notify the Clerk of the Court – in addition to serving and filing a notice of change of address in each pending case in which the attorney has appeared – Mr. Wilson has thus far failed to comply with this rule.

Defendants thank this honorable Court for its time and attention to this case.

Dated: Lake Success, New York
April 11, 2022

Respectfully submitted,

MILMAN LABUDA LAW GROUP PLLC

/s

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